

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 25-80009-CR-CANNON/McCABE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHAROAD ROLLE,

Defendant.

_____ /

STIPULATED STATEMENT OF FACTS

A. Elements of Offense

By his signature below, the defendant understands and acknowledges that were this matter to have proceeded to trial, the United States would have had to prove the following elements beyond a reasonable doubt as Count 3 of the Information, which count charges the defendant with Knowingly Encouraging and Inducing an Alien to Enter the United States in violation of the law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv), 1324(a)(1)(A)(v)(ii), and 1324(a)(1)(B)(ii):

- (1) C.C. was an alien;
- (2) The defendant encouraged or induced C.C. to come to or enter the United States in violation of law; and
- (3) The defendant knew or was in reckless disregard of the fact that C.C.'s entry into or residence in the United States would be in violation of the law.

An alien is a person who is not a citizen or national of the United States.

To "encourage" means to knowingly instigate, to incite to action, to give courage to, to inspire, to embolden, to raise confidence, to help, to forward, and/or to advise.

To "induce" means to knowingly bring on or about, to affect, cause to influence an act or course of conduct, lead by persuasion or reasoning, incite by motives, and/or to prevail on.¹

B. Statement of Facts

Had this matter proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt, through admissible testimony and evidence, which the defendant agrees, by his signature below, are true and correct facts, and satisfy all the necessary elements of the offenses of conviction referenced above and in paragraph 1 of the Plea Agreement:

1. On or about January 16, 2025, at approximately 10:00 p.m., United States Customs and Border Protection Air and Marine Operations (AMO) West Palm Beach (WPB) was notified by United States Coast Guard (USCG) Cutter Seahorse of a suspicious inbound vessel operating with no visible navigational lights and multiple people on board. AMO WPB utilized the coordinates of the last known position of the inbound vessel provided by PBSO Aviation unit, discovering the vessel one nautical mile due east of Palm Beach Island, within the coastal waters of the United States, and Palm Beach County and the Southern District of Florida. AMO WPB, USCG, and PBSO Marine Agents arrived on scene and observed multiple individuals sitting on board and one

¹ The use of dictionary definitions of "encourage" and "induce" was approved in *United States v. Lopez*, 2009 WL 4912117 (11th Cir. 2009).

occupant standing at the bow of the vessel. The vessel having been detected entering the customs and immigration zone of the United States, a CBP officer asked a male subject who the officer observed standing at the bow of the vessel if he was the captain/driver of the vessel, and where they were coming from. The male at the front of the vessel's bow, later identified as defendant in this case, Sharoad ROLLE, a citizen and national of the Bahamas, responded that he was "the captain," and stated they were coming from Freeport, Bahamas and that he was just trying to get to land.

2. After determining that none of the other occupants of the vessel spoke English or were in possession of any documents which would lawfully permit their entry into the United States, defendant ROLLE and all migrants were transferred to the USCG Safe boat and were brought to the Coast Guard Cutter Seahorse for biometrics and processing. In addition to defendant ROLLE, a total of 5 adult Haitian females, 7 adult Haitian males, one of whom was subsequently identified as "C.C.," and 2 adult Brazilian males, for a total of 14 illegal aliens (less the captain, defendant ROLLE), were discovered on board the vessel, none of whom possessed any documents permitting their lawful entry into the United States.

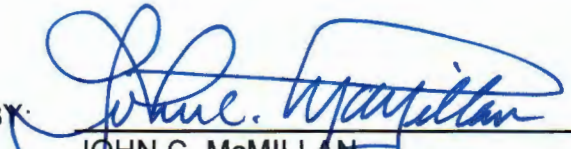
3. On January 17, 2025, defendant ROLLE was taken from the USCG Cutter, landed at the USCG Lake Worth Inlet Station in Riviera Beach, Florida, and taken across the street to the U.S. Border Patrol Station in Riviera Beach for immigration processing. Thereafter, HSI Special Agents Justin Washburn and Joshua Woodbury, conducted an audio and video recorded interview of defendant ROLLE. At the initiation of the interview, SA Woodbury advised defendant ROLLE, who spoke fluent English, of his *Miranda*

warnings using the standard HSI advice of rights form, after which defendant ROLLE advised he understood his rights, advised he would voluntarily speak to the agents, and signed a written HSI *Miranda* warnings waiver form. Thereafter, defendant ROLLE claimed that while he had been at a bar in 8 Mile Rock, Bahamas, a man entered entered and purchased food items. Defendant ROLLE claimed he approached the man, who told defendant ROLLE he was getting snacks for a trip to the United States. Defendant ROLLE requested the male take him to the United States, as he was looking to find more consistent employment in the United States. Defendant ROLLE told agents that he typically worked as a tile mason, fisherman, and diver. Defendant ROLLE stated that while aboard the boat (in U.S. Territorial Waters) he operated the vessel for approximately 25 minutes. He observed helicopter lights in the distance and slowed the engine to an idle, ultimately stopping the vessel. Once met by U.S. CBP law enforcement on the vessel, defendant ROLLE stated he admitted to being the boat captain, as he was behind the wheel. Defendant ROLLE advised that he only operated the vessel for approximately 25 minutes. Defendant ROLLE admitted knowing there were Haitian nationals aboard the vessel when he departed Bahamas en route to the United States, and thus, in so doing, ROLLE indicated his awareness that he was assisting foreign nationals to

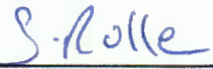
unlawfully enter the United States while piloting the boat in Palm Beach County in the Southern District of Florida.

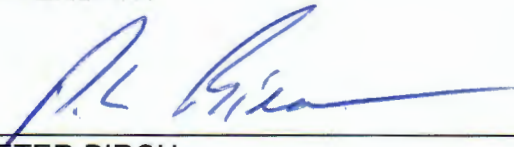
Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

BY: 
JOHN C. McMILLAN
ASSISTANT UNITED STATES ATTORNEY

SEEN, AGREED AND APPROVED:


SHAROAD ROLLE
DEFENDANT


PETER BIRCH
SUPERVISORY ASSISTANT FEDERAL
PUBLIC DEFENDER
ATTORNEY FOR DEFENDANT

Dated: 2/27/25

At West Palm Beach, Florida.